C.T.Lewis Ltd

Environmental Management System

For Recycling Facilities at Unit 11 and the Former Engine House, Kemys Way, Enterprise Park, Swansea

Contents

1. Aspect Identification:

The table below identifies all environmental aspects associated with the operation of the facility and identifies the sections of this document which address these aspects.

Consents/Consultation	*Applicable ✓/x*	***Potential***	***Control Measures Reference***
Does the facility require and Environmental Permit	✓	Non compliance with Environmental Permitting Regulations	- H Permit - Doc Ref. GWS Doc Ref.
Are you aware of the conditions of this permit and are they being met?	✓	Non compliance with Environmental Permitting Regulations	Review conditions of permit and ensure they are addressed by operating procedures. - EMS Ref.
Will discharge consent be required for the facility?	X		
Will consultation be required with the Environment Agency	✓	EA have the right to inspect the facility at any time to ensure the conditions of the EP are being met.	Maintain good relationship with EA and Swansea City Council
Will consultation be required with Swansea CC Env Health Dept	✓	*Prohibition notice being served.*	Formal consultation will be undertaken as part of the planning process for the facility - no date with planning granted

Conservation Requirements	***Applicable ✓/x***	***Potential***	***Control Measures Reference***
Does the facility fall within any designated areas (SSSI, SAC, LNR, NNR,etc)	X		
Are any species or habitats likely to be affected by works ongoing at the facility.	X	*Prosecution for protected species offences.*	The area around the site is heavy industrial. This make the presence of protected species unlikely

Surface and Groundwater	*Applicable ✓/x*	***Potential***	***Control Measures Reference***
Will it be required to discharge surface runoff from the site?	✓	*Pollution of controlled waters.*	Surface runoff will be discharged via an oil separator on the next site. to sewer
I there a potential for this water to be contaminated?	✓	*Pollution of controlled waters*	Good practice will be used in storage and handling of wastes and in the maintenance of vehicles. Ref ppt

Will runoff be discharged to a watercourse?	X	*Pollution of Controlled Waters*	Runoff discharged to foul sewer via an interceptor.
Will the facility affect groundwater or drainage into an aquifer?	X	*Pollution of Controlled Waters*	Site has an impervious base and a sealed drainage system.
Will the facilty require abstraction from a watercourse or aquifer?	X		
Will the works require discharge to a watercourse or aquifer?	X		
Is there a requirement for a soakaway on site?	X		
Will it be required to discharge to a mains sewer?	✓		Runoff, toilets and office block discharge to a mains sewer.
Are the works in a flood risk area?	X/✓	*Mobilisation of pollutants to Controlled Waters and the Environment.*	From EA Flood Risk map there is a low risk of flooding but there is no historical occurrence of flooding at the site.

Risks of Pollution	*Applicable ✓/x*	***Potential***	***Control Measures Reference***
Hydrocarbon contaminated runoff into surface drainage	✓	*Pollution of Controlled Waters*	Leaks from vehicles entering or leaving the site. Relatively low volume of site traffic.
Chemical contaminated runoff into watercourses and groundwater	✓	*Pollution of Controlled Waters*	Potential for the leakage of hazardous substances from wastes stored at the site.

Storage Risks	***Applicable ✓/x***	***Potential:***	***Control Measures Reference:***
Fuels – Storage location – watercourses, boreholes, etc	✓	*Pollution of Controlled Waters – Fuel for plant and equipment stored in fuel cans, leakage from plant and machinery.*	Impervious base and drainage via interceptor. Fuels and chemicals stored in secure bunded areas. Re-fuel procedure for machinery.
Storage of Controlled Wastes on site	✓		Controlled wastes will be stored in a secure manner on site.

Storage of Hazardous Wastes on site	✓		*It is not intended to store hazardous waste on site but the situation may occure whereby some wastes bought to site are assessed as having hazardous properties and need to be segregated for disposal.*
Storage of WEEE at the site.	✓/X	*Compliance with Environmental Permit.*	It is not intended to accept WEEE at the facility. Customer s to be instructed in writing regarding waste types accepted. If WEEE is included within a load it will be segregated to the quarantine area and disposed of with the cost recharged to the customer.

Nuisances	***Applicable ✓/x***	***Source etc.***	***Control Measures Reference***
Noise:	✓	*Nuisance and disruption to residents and businesses.*	Noise levels are likely to increase moderately due to activity at the site. The impact of this is likely to be low due to the location of the site and the nature of the surrounding land use.
Odours	✓	*Nuisance to residents and businesses.* Odour release is likely during the tipping of waste.	Damping down will be undertaken if required. Odorous wastes will be segregated and enclosed if required.
Dust	✓	*Nuisance to residents and businesses. Release of particulates possible during the tipping of waste.*	Wastes will be damped down prior to or during tipping if required. Loads will be assessed for dust production potential prior to tipping.
Vibration	X		No noticeable increase in vibration levels around the site.
Traffic Disruption	X	*Increase in noise, dust and vibration. Disruption and delay*	Slight increase in traffic levels along Kemys Way

		to highway users.	and feeder routes but these are not near capacity. – Planning doc.
Lighting	X		*Low level flood lighting positioned on buildings. Care taken to ensure this does not illuminate outside the yard. No sensitive receptors nearby.*
Visual Intrusion	X	*Nuisance to surrounding properties.*	Site is surrounded by heavy industrial properties. Housekeeping to be maintained.
Will nuisance affect residential properties?	X		No residential properties in the vicinity of the site.
Will nuisance affect business properties	X	*Increased noise, vibration, dust and light levels*	Both sites are surrounded by heavy commercial properties. Good practice will be used to minimise nuisance. complaints investigated. communicate with EA. action recorded e.g. dust suppression
Will nuisance affect recreation, schools, worship, community buildings	X		

Contaminated Land	***Applicable ✓/x***	***Potential***	***Control Measures Reference***
Is there identified contamination on site?	X	*Risk to users and future users of the site. Difficulties in the surrender of the Environmental Permit.*	From desk study, there is potential for low level metal contamination consummate with the nature of the fill material on which the site is constructed (fly ash, BFS) Pre 1965 operations
Is there asbestos on site?	X		Unlikely – buildings at the site post date the banning of asbestos.
Is there evidence of dis-used drums and canisters on site?	X		No evidence.

2. Consenting:

An Environmental Permit is in place for the facility which allows the following activities to be undertaken:

- The storage, sorting, treatment and transfer of household, commercial and industrial waste.

The Environmental Permit attaches conditions to be fulfilled throughout the operational period of the facility. If there are any changes to the activities carried out at the facility, application needs to be made to the Environment Agency for an amendment to the Environmental Permit or a new Permit may be required.

The Environment Agency are the enforcing authority for the Environmental Permit and they have the right to visit and inspect the site at any time and without appointment.

If a discharge is to be made into a sewer, consent will be required from the undertaker responsible for that sewer.

3. Aspect Specific Risk Identification and Control:

3.1 General:

Risks:

- Hydrocarbon contaminated runoff entering controlled waters
- Chemical contaminated runoff entering controlled waters
- Site security – tampering with stored wastes and equipment
- Litter and waste left around the site. Dirt left at the site which can become windblown and cause nuisance.
- Noise and vibration nuisance.

Controls:

- The sites are fenced on all sides with 2.4m high palisade fences. There are heavy duty palisade gates which are locked at the end of the working shift.
- Regular litter picks of the sites will be undertaken to retrieve all windblown and deposited waste. Housekeeping will be maintained to a high standard through daily inspection.
- Waste will be stored in a controlled contained manner to prevent the leakage of hazardous substance. If leakages occur they will be contained through the use of secondary containment (sealed containers, drip trays, etc)
- All hydrocarbons and chemicals spilt will be cleaned up immediately using absorbent granules and degreasers. Contaminated granules will be placed into hazardous waste containers for disposal as hazardous waste. A dispersant shall be applied to hydrocarbon residues. Spill kits will be kept at the site at strategic locations.
- Noise and vibration – the site is surrounded by heavy industrial premises therefore noise and vibration impacts will be less significant. Works at the site will undertaken within normal working hours. Best Practice will be used in the form of not over reving engines, minimising drop heights for materials, restricting working hours, minimising impacts between objects and adopting an attitude of being a 'good neighbour'.

3.2 Transportation of Wastes and recovered materials, to and from the site:

Risks:

- Release of hydrocarbons (oils and fuels) from vehicles
- Silt being mobilised by vehicle movements

- Dust being generated by vehicle movements
- Emissions from vehicles
- Noise and vibration from vehicles entering and leaving the site and from vehicles movements around the site.

Consequence:

- Hydrocarbons entering surface water drainage
- Hydrocarbons entering groundwater
- Silt entering surface water
- Dust nuisance caused to surrounding residents and businesses
- Noise and vibration nuisance
- Long and short term health effects from the inhalation of particulates and other emissions.

Controls:

- The surface of the site is impermeable and all surface water drainage passes into a sealed drainage system discharging to foul sewer via a hydrocarbon separator.
- All vehicles used in the transportation of waste and recycled materials will be maintained to ensure that they do not leak any liquids.
- If vehicles are found to be leaking any liquids they will be removed from service until the leak has been repaired. If they are stored at the site awaiting repair, a drip tray shall be placed under the area of the leak.
- Spill kits will be kept at the site.
- Any spillages from vehicles shall be cleaned up immediately using absorbent pads and granules. A dispersant shall be applied to hydrocarbon residues. Used absorbent pads and granules will be stored in a secure container and shall be disposed of as Hazardous Waste
- Noise and vibration – the site is surrounded by heavy industrial premises therefore noise and vibration impacts will be less significant. Works at the site will undertaken within normal working hours. Best Practice will be used in the form of not over reving engines, minimising drop heights for materials, restricting working hours, minimising impacts between objects and adopting an attitude of being a 'good neighbour'.

3.3 Tipping and Sorting of Wastes:

Wastes will be bought to site in skips or bins and will be tipped into the sorting bays at the eastern end of the Former Engine House site.

Risks:

- Waste being stored and processed in contravention of the Environmental Permitting Regulations (England and Wales) (2007)
- Release of hazardous substances from stored and processed wastes
- Noise and vibration from processing tools and vehicles.

Consequence:

- Prosecution by the EA or an Improvement Notice being served and the closure of the facility.
- Hazardous substances entering soils
- Hazardous Substances entering groundwater
- Hazardous substances entering surface water drainage
- Waste materials being windblown across the site and adjacent sites causing pollution and nuisance.
- Noise and vibration nuisance.

Controls:

- Environmental Permit to be put in place for all wastes handled at the site. If it is proposed to process further wastes, additional permits or amendments to existing permits will be required.
- A WAMITAB Competence Assessment is to be completed within three months of the facility becoming operational. NVQ modules 1NH, 2NH, 3, 4TSWE4, 4TSNH, 6TSNH, 8NH
- All waste loads will be visually assessed prior to tipping, in order to identify any wastes which are not accepted under the Environmental Permit for the facility. Any wastes included within loads which the facility is not licensed to receive i.e. hazardous wastes, plant wastes, WEEE, asbestos, etc will be moved to a quarantine area within the site boundary to await onward disposal appropriate to that waste. These wastes will be categorised under procedures set out within Environmental Agency Guidance WM2. Suitable training will be given to all personnel on the procedures set out in this guidance. Waste being quarantined will be stored in containers suitable for that waste i.e. sealed drums, pallets with shrink wrap, etc. All unacceptable wastes will be handled with care to ensure that no damage resulting in the release of hazardous substances occurs. Wastes will be inspected daily to ensure that no degradation has occurred, which could result in the release of hazardous substances.
- Loads will be assessed for their potential to generate dust with observations being made for materials and substances composed of fine particulates. If loads are identified as having potential to generate dust they will be damped down using a sprinkler on a high pressure hose prior to being tipped.
- During tipping and sorting, if any wastes are spilt, the spillage will be contained and the materials cleaned up immediately. If spilt materials enter an adjacent site, permission shall be sought from the site operator for the immediate cleanup of these materials.
- Care will be taken not to mix waste types and instruction on the recognition and segregation of wastes shall be provided to all personnel prior to commencing work at the facility.
- Wastes will be stored in secure containers on impervious surfaces.
- Waste shipments leaving the site will be inspected to ensure they are of sufficient quality for further processing. Duty of Care Inspections will be carried out at the facility and also at the destination facility.
- Wastes will only be transported by hauliers with a valid Waste Hauliers License. A copy of this license will be retained on file.
- Waste Transfer notes will be produced for all wastes entering and leaving the site. Copies of these will be retained for a period of 6 years.
- Noise will be minimised through good practice i.e. not over reving engines, minimising drop heights for materials, restricting working hours, minimising impacts between objects and adopting an attitude of being a 'good neighbour'.

3.4 Treatment of Hazardous Waste and WEEE:

If WEEE is encountered within loads it shall be separated and stored in the quarantine area awaiting further disposal.

Risks:

- Waste being stored and processed in contravention of the Environmental Permitting Regulations (England and Wales) (2007)
- Release of hazardous substances from stored and processed wastes.

Consequence:

- Prosecution by the EA or an Improvement Notice being served and the closure of the facility.

Controls?

Where are pages 10 and 11?

Appendix A – Getting the Basics Right:

Where does it say site will be managed in line with?

Is it in permit or another part of EMS?